From: <u>Kira Kelley</u>
To: <u>Claire Glenn</u>

Cc: Enslin, Sharda; Robertson, Heather (she/her/hers); Sarff, Kristin

Subject: [EXTERNAL] Re: Draft protective order

Date: Friday, July 26, 2024 5:53:56 PM

Attachments: Supplement to Initial Disclosures.pdf

Hi Attorney Enslin,

I had a few quick questions/notes on my list to check in with you about, and hopefully you're not stuck at a desk working on the weekend and not seeing this until Monday.

First, how does our protective order second draft look? Anything you'd like to talk through so we can finalize that and send it in?

Second, we're looking to do a 30(b)(6) evidentiary deposition with the City. I'm working up the formal notice right now, with a list of questions/topics, but wanted to give you a heads up and to inquire as to your and the City's availability for that so we can get something on the books.

Third, we had a few supplements to our disclosures to share, which I have attached.

Thank you,

Kira

Kira Kelley (they/she) Staff Attorney Climate Defense Project climatedefenseproject.org